

1 Anna C. Haac (*pro hac vice*)  
2 Shilpa Sadhasivam (*pro hac vice*)  
3 David McGee (*pro hac vice*)  
4 **TYCKO & ZAVAREEI LLP**  
5 2000 Pennsylvania Avenue N.W.,  
6 Suite 1010  
7 Washington, DC 20006  
8 Telephone: (202) 973-0900  
9 Facsimile: (202) 973-0950  
10 *ahaac@tzlegal.com*  
11 *dmcgee@tzlegal.com*  
12 *ssadhasivam@tzlegal.com*

13 Annick M. Persinger (SBN 272996)  
14 Sabita J. Soneji (SBN 224262)  
15 Emily Feder Cooper (SBN 352951)  
16 **TYCKO & ZAVAREEI LLP**  
17 10880 Wilshire Boulevard, Suite 1101  
18 Los Angeles, CA 90024  
19 Telephone: (510) 254-6808  
20 Facsimile: (202) 973-0950  
21 *apersinger@tzlegal.com*  
22 *ssoneji@tzlegal.com*  
23 *ecooper@tzlegal.com*

24 **UNITED STATES DISTRICT COURT**  
25 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

26 IOLA FAVELL, SUE ZARNOWSKI,  
27 MARIAH CUMMINGS, and AHMAD  
28 MURTADA, *on behalf of themselves*  
*and all others similarly situated,*

Plaintiffs,

v.

UNIVERSITY OF SOUTHERN  
CALIFORNIA,

Defendant.

Eric Rothschild (*pro hac vice*)  
Tyler Ritchie (*pro hac vice*)  
Chris Bryant (*pro hac vice*)  
Madeline Wiseman (SBN 324348)  
**NATIONAL STUDENT LEGAL  
DEFENSE NETWORK**  
1701 Rhode Island Avenue N.W.  
Washington, DC 20036  
Telephone: (202) 734-7495  
*eric@defendstudents.org*  
*tyler@defendstudents.org*  
*chris@defendstudents.org*  
*madeline@defendstudents.org*

*Counsel for Plaintiffs*

Case No. 2:23-cv-00846-GW-MAR;  
Case No. 2:23-cv-03389-GW-MAR

**CLASS ACTION**

**PLAINTIFFS' PROPOSED ORDER  
GRANTING PLAINTIFFS'  
MOTION FOR CLASS  
CERTIFICATION**

**[PROPOSED] ORDER GRANTING PLAINTIFFS' MOTION FOR CLASS CERTIFICATION**

Plaintiffs' Motion for Class Certification was filed on December 2, 2024 and heard on \_\_\_\_\_, 2025. Having considered the moving and reply papers, all papers in opposition, the argument of counsel, the pleadings and files in this action, and all other matters properly before this Court, the Court hereby ORDERS that the proposed classes are certified under Rules 23(a) and (b)(3) of the Federal Rules of Civil Procedure, and the Classes are defined as:

Class: All persons who: (1) were enrolled in the online MAT (single subject ("SS") or multiple subject ("MS")) or the online Ed.D in Organizational Change and Leadership ("OCL") at Rossier; (2) began classes in a program cohort between August 2017 and January 2022; and (3) paid or were obligated to pay tuition for classes associated with the program in which they enrolled.<sup>1</sup>

Online MAT Damages Subclass: All Class Members who were enrolled in the online MAT (SS or MS) at Rossier.

Online OCL Damages Subclass: All Class Members who were enrolled in the online Ed.D in OCL at Rossier.

The Court finds that Plaintiffs have satisfied each element of Fed. R. Civ. P. 23(a) and 23(b)(3).

The Court further appoints Iola Favell, Sue Zarnowski, Mariah Cummings, and Ahmad Murtada as representatives of the Class and the law firms of Tycko & Zavareei LLP and National Student Legal Defense Network as Class Counsel.

---

<sup>1</sup> Specifically excluded from the putative Classes are Defendant, any entities in which Defendant has a controlling interest, any of Defendant's parents, subsidiaries, affiliates, officers, directors, employees, and members of such persons' immediate families, and the presiding judge in this case, their staff, and his, her, or their immediate family.

1 The Court will hold a status conference in this matter on \_\_\_\_\_, 2025 at  
2 \_\_\_\_\_ to discuss sending Notice to the Class as well as the schedule for the  
3 remainder of the litigation.

4 SO ORDERED this \_\_\_\_\_ day of \_\_\_\_\_, 2025.  
5  
6  
7

8 \_\_\_\_\_  
Hon. George H. Wu  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28